



**West Lake Landfill: EPA comments on additional groundwater monitoring
SAP**

Dan Gravatt to: Bob Jelinek, Charlotte Neitzel, Whitby, Kathleen,
jmerrigan, victoria warren, Paul Rosasco
Cc: Shawn Muenks

06/13/2012 03:49 PM

All,

Attached are EPA's comments on the additional groundwater monitoring SAP, received via e-mail
June 8, 2012. Call with any questions.

Sincerely,
Daniel R. Gravatt, PG
US EPA Region 7 SUPR / MOKS
901 North 5th Street, Kansas City, KS 66101
Phone (913) 551-7324 Fax (913) 551-7063

Principles and integrity are expensive, but they are among the very few things worth having.



EPA Comments on Additional GW Sampling SAP.pdf

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

JUN 13 2012

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Paul Rosasco, P.E.
Engineering Management Support, Inc.
7220 West Jefferson Avenue, Suite 406
Lakewood, Colorado 80235

RE: Draft Sampling and Analysis Plan – Additional Groundwater Monitoring for
West Lake Landfill Operable Unit 1, Bridgeton, Missouri, June 8, 2012

Dear Mr. Rosasco,

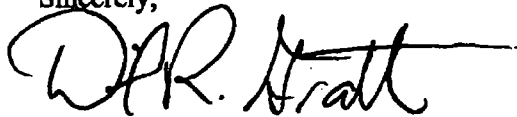
The U.S. Environmental Protection Agency has reviewed the subject document, received via electronic mail on June 8, 2012, and provides the following comments:

1. This document should explicitly identify and incorporate by reference all previously approved project planning documents which will be used for this sampling event, including but not limited to Sampling and Analysis Plans, Quality Assurance Project Plans, Health and Safety Plans and standard operating procedures.
2. The EPA requests that wells classified as abandoned, destroyed, damaged, or missing, particularly those on property owned by the landfill, be further investigated to determine if they can be sampled during this event. Simple repairs should be made where practical to return these wells to operational status so they can be sampled. For misaligned or partially obstructed wells, a smaller diameter inertial pump which would pass these obstructions should be considered.
3. In the fourth paragraph under "Sample Collection," the intervals to be used between measurements of field parameters are poorly defined and should be clarified.
4. The fourth paragraph under "Sample Collection" proposes not to sample wells that do not recover "sufficiently" within 24 hours after purging. The EPA requests these wells be allowed to recover for additional time to determine if they can be sampled. Alternatively, the EPA requests that samples be prioritized in these low-recovery wells to use the available water. First priority should be given to the uranium, thorium and radium isotopic sample, followed by volatile organics and trace metals.
5. The analytical methods proposed for the uranium, thorium and radium isotopic analyses are identical to those proposed in the February 2, 2004 letter workplan for the last groundwater

sampling event; however, the analytical methods reported by Severn Trent Laboratories in their April 20, 2004 and June 14, 2004 analytical reports do not appear to match that workplan's specified methods. This apparent discrepancy must be investigated, and the current workplan should be modified as necessary.

A final workplan incorporating these changes must be provided within fifteen (15) days of your receipt of this letter. If you have any questions, you may contact me at 913-551-7324.

Sincerely,

A handwritten signature in black ink, appearing to read "D.R. Gravatt", with a long horizontal flourish extending to the right.

Daniel R. Gravatt, PG
Remedial Project Manager
Missouri-Kansas Branch
Superfund Division

cc: Shawn Muenks, MDNR
Robert Jelinek, Engineering Management Support, Inc. (e-mail only)
Charlotte Neitzel, Bryan Cave HRO (e-mail only)
Kate Whitby, Spencer Fane Britt & Browne (e-mail only)
Jessica Merrigan, Lathrop & Gage (e-mail only)
Victoria Warren, Republic Services, Inc. (e-mail only)